

Exhibit D

David Rothstein

From: David Rothstein <drothstein@rothsteinlawfirm.com>
Sent: Friday, March 27, 2015 12:00 AM
To: 'Kathryn Thomas'
Cc: 'Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)'
Subject: RE: Irani

Kathryn. I will address the items below and those from your Feb. 27 correspondence over the weekend, when I have available time to turn my attention to Dr. Irani's case. In the mean time, please supplement your interrogatory response to provide a meaningful response to the 13 of the 16 interrogatories to which you objected. Your previous position that I should be able to find the answers to your interrogatories myself by reviewing your document production is clearly not appropriate.

Also, please provide to me complete responses to the Interrogatories and Requests for Production directed at the individual Defendants Koon and Walsh so that I may have them in sufficient time to prepare for their depositions on April 21 and 22. You will recall that in my e-mail of 12/17/15, I stated, "As long as I can get complete responses to my discovery from USC and Palmetto Health, I am fine with holding off on the individual discovery of Koon and Walsh until after the qualified immunity issue is addressed by the Court." Because you have failed to satisfy the express condition of my prior accommodation--namely providing complete discovery responses to me from USC--I must now insist on receiving the discovery responses from the individual Defendants in this case. I am happy to discuss this further with you if you would like. Thank you, Dave.

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From: Kathryn Thomas [mailto:kthomas@gsblaw.net]
Sent: Thursday, March 26, 2015 7:59 PM
To: David Rothstein (drothstein@rothsteinlawfirm.com)
Cc: Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)
Subject: Irani

David –

I sent you an email earlier today requesting unredacted copies of your bates-numbered documents 553, 589, 611, 632, and 1149.

We have found some documents in your production that show patient names that should be redacted by all parties. They are your bates-numbered documents 636, 911, 913, 1011, and 1946. Please confirm you agree.

We believe Dr. Irani needs to amend and supplement his discovery responses and document production in several respects, in addition to those set forth in my February 27 correspondence below:

Interrogatory 2: We are entitled to requested information about Dr. Irani's and his agents' communications with Defendants' current and former agents and employees. Please provide the requested information.

Interrogatory 3: We are entitled to information about Dr. Irani's attempts to seek employment for the last five years. Dr. Irani has produced a good bit of documentation of his job-seeking efforts. We will not require that he set forth, in response to the interrogatory, his job-seeking efforts that are fully represented by his document production. We have learned from you, however, that Dr. Irani accepted a job in 2014 that he is scheduled to start July 8, 2015. We expect Dr. Irani to provide information sought in interrogatory 3 as relates to that job, as well as related documentation we have requested in our document requests. We would rather not have to subpoena records from Dr. Irani's employer/prospective employer.

Interrogatories 4 and 5: We are entitled to information about Dr. Irani's employment and residency history, education, and training. Dr. Irani has produced a good bit of documentation of such matters. We will not require that Dr. Irani set forth, in response to the interrogatory, such information as is represented in his document production. To the extent such matters are not represented by his document production, we expect responses, particularly as relates to matters in the past three years and any education, training, employment, and residency not already provided.

Interrogatory 6, and document request 5: We are entitled to information about Dr. Irani's health care treatment for the past five years, which is a reasonably-limited time period specifically geared to discovery of information relevant to Dr. Irani's claims for emotional damages. We will not require that Dr. Irani set forth, in response to the interrogatory, such information as is represented in his document production, but we believe we are entitled to the requested information. Dr. Irani may satisfy the interrogatory and document request by producing complete copies of his medical records for the past five years, which he may designate "confidential" pursuant to the terms of the Confidentiality Order in this case.

From: Kathryn Thomas
Sent: Monday, March 09, 2015 6:38 PM
To: 'David Rothstein'
Cc: kathy.helms@ogletreedeakins.com; Timmons, Todd S. (Todd.Timmons@ogletreedeakins.com); Fred Williams
Subject: Irani

David –

I need more from you than a response that you are too busy to address this case this week. Do you definitely plan to review these matters and supplement production? Is it a matter of your needing more time beyond this week to do so?

From: David Rothstein [<mailto:drothstein@rothsteinlawfirm.com>]
Sent: Monday, March 09, 2015 6:28 PM
To: Kathryn Thomas
Cc: kathy.helms@ogletreedeakins.com
Subject: RE: Irani

Kathryn. I was out of the office all day Friday and have been working on several other matters today that have more pressing deadlines. I am out of the office in Columbia all day tomorrow and have depositions the next two weeks in a collective action case. I will try to review your e-mail and request later this week, but I cannot guarantee that I will get to it before Friday. Dave.

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From: Kathryn Thomas [<mailto:kthomas@gsblaw.net>]
Sent: Monday, March 09, 2015 6:19 PM
To: 'David Rothstein (drothstein@rothsteinlawfirm.com)'
Cc: 'Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)'; 'Timmons, Todd S. (Todd.Timmons@ogletreedeakins.com)'; Fred Williams
Subject: Irani

David –

Please let us hear from you on this, and let us know when we might expect to receive the missing documentation. Will it be this week? Do you need more time beyond this week to get it to us?

From: Kathryn Thomas
Sent: Friday, March 06, 2015 1:11 PM
To: 'David Rothstein (drothstein@rothsteinlawfirm.com)'
Cc: 'Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)'; 'Timmons, Todd S. (Todd.Timmons@ogletreedeakins.com)'; Fred Williams
Subject: Irani

David –

Please let us hear from you on this, and let us know when we might expect to receive the missing documentation. We also need documentation of the job Dr. Irani has accepted, as referenced in your document production and expert reports. Our discovery requests had asked about Dr. Irani's employment search and status, and nothing was disclosed about his having sought such a position or his having accepted an employment offer and signing bonus. It appears Dr. Irani needs to update his discovery responses in this and several other respects, including the status of his California matter.

From: Kathryn Thomas
Sent: Friday, February 27, 2015 6:24 PM
To: David Rothstein (drothstein@rothsteinlawfirm.com)
Cc: Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com); Timmons, Todd S. (Todd.Timmons@ogletreedeakins.com); Fred Williams
Subject: Irani

David –

I have not thoroughly reviewed your document production, but so far have noted significant documentation that is missing, and other information that has been redacted for unspecified reasons.

You have produced a hearing transcript from Dr. Irani's California Medical Board appeal, along with written summary arguments provided by the parties, but you have not produced the various exhibits referenced in the transcript and the summaries. Please produce all of the exhibits, and all other documentation related to the appeal proceedings.

The "expert witness" information you have produced references, but does not include, the documentation and other information provided to the purported experts. Please produce all documentation and other information provided to each purported expert.

Please provide unredacted copies of your documents bates-numbered 553, 611, and 632.

The document bates-numbered 636 includes an unredacted name (C____T____). It appears you have redacted that name elsewhere on that page. If that is a patient name, we all need to redact it. Please confirm whether or not that is a patient name.

Bates-numbered pages 1149-1153 appear to be documents Dr. Eady faxed to Dr. Irani, indicating a fax date of August 10, 2014. It appears someone has attempted to redact some information, including the fax number from which Dr. Eady faxed the information. Please produce the original as well as an unredacted copy of the faxed document, including the fax confirmation page which should also show the fax number from which Dr. Eady sent the fax.

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